

No. 20-\_\_\_\_\_

SUPREME COURT OF THE UNITED STATES

Lewana Howard

Petitioner

vs.

Gabriel Defratis, et al

Respondents

---

XI. Certificate of Compliance

As required by Supreme Court Rule 33.1 (h), I certify that the document contains 2,476 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Dated 8 - 28, 2020



Lewana Howard  
Petitioner, Pro Se